

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

K.H. JANE DOE,

Plaintiff,

vs.

Case No.: _____

NICOLE SAFTIG,
c/o NEW BERLIN POLICE
DEPARTMENT,
CITY OF NEW BERLIN,
ABC INSURANCE CO., and
XYZ INSURANCE CO.,

Defendants.

NOTICE OF REMOVAL

PLEASE TAKE NOTICE that the defendants, Nicole Saftig, the New Berlin Police Department and the City of New Berlin, by their attorneys, Gunta & Reak, S.C., hereby remove Waukesha County Circuit Court Case No. 09-CV-04764, captioned K.H. Jane Doe v. Nicole Saftig, the New Berlin Police Department and the City of New Berlin, from the Waukesha County Circuit Court to the United States District Court for the Eastern District of Wisconsin. The grounds for removal are:

1. This action was commenced on November 30, 2009. On November 30, 2009, plaintiff filed a Summons and Complaint which asserted federal civil rights claims against Defendants, Nicole Saftig, the New Berlin Police Department and the City of New Berlin, under the Fourteenth Amendment to the United States Constitution, Article I §§ 1, 9 and 22 of the Wisconsin

Declaration of Rights, 15 U.S.C. § 1681. et. seq. and 42 U.S.C. § 1983. The Summons and Complaint were received by the Defendants on or after December 1, 2009. A copy of the Summons and Complaint are attached to this notice.

2. Plaintiff's federal civil rights claims against defendants are asserted in paragraphs 3, 20, 22, and 23 of the Complaint. This Court has original jurisdiction over these claims under 28 U.S.C. § 1331. This Court has supplemental jurisdiction over Plaintiff's state law claims under 28 U.S.C. § 1367(a).

3. The defendants seek removal pursuant to 28 U.S.C. § 1441 et. seq. on the grounds that this Court has original jurisdiction over Plaintiff's federal civil rights claims and supplemental jurisdiction over Plaintiff's other claims.

Dated at Milwaukee, Wisconsin, this 22nd day of December, 2009.

GUNTA & REAK, S.C.
Attorneys for Defendants Nicole Saftig,
City of New Berlin Police Department,
and City of New Berlin

By: /s/ Gregg J. Gunta
Gregg J. Gunta Bar Number: 1004322
GUNTA & REAK, S.C.
219 North Milwaukee Street, Fifth Floor
Milwaukee, Wisconsin 53202
Telephone: (414) 291-7979
Facsimile: (414) 291-7960
E-mail: gjg@gunta-reak.com